

# **EXHIBIT 4**

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**From:** [Matt Williams](#)  
**To:** [Scott Drury](#)  
**Cc:** [Mariah Garcia](#); [Julie Goodwin](#)  
**Subject:** RE: Charles P. Golbert v. Aurora Chicago Lakeshore Hospital, et al., Case No. 1:19-CV-08257 (N.D.Illinois.)  
**Date:** Monday, June 21, 2021 1:09:02 PM

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Scott,

I meant to respond last week, but things got hectic for me due to an out of state evidentiary hearing I had. I apologize for the slight delay.

I've talked with Sabra about emails dating back to the transaction wherein Care Capital Properties ("CCP") bought and leased back to Signature hospitals, including one of the buildings of Aurora Chicago Lakeshore Hospital. Sabra does not have these emails, as it did not keep the CCP servers after the CCP/Sabra merger and did not separately store the email files of the CCP employees that worked on the transaction.

With respect to the transaction documents (e.g. asset purchase agreement, lease, closing statement, etc.), as I indicated on the phone and in my email below, Sabra sees no reason that these documents cannot and should not be requested from Signature, which is a party and which I'm sure has possession of them. There's no reason of which I'm aware that Sabra, a non-party, would need to play a role with respect to these documents. If you know of any legitimate reason that Sabra should be involved when the documents can be produced by a party to the lawsuit (assuming that the documents are "relevant" to the matter), please let me know so I can consider it. Otherwise, the parties should see if they can agree on production of the documents you'd like, and if not, the parties can litigate that issue and let the Court decide.

Matt

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**From:** Scott Drury <[drury@loevy.com](mailto:drury@loevy.com)>  
**Sent:** Monday, June 14, 2021 10:02 AM  
**To:** Matt Williams <[Mwilliams@fmdlegal.com](mailto:Mwilliams@fmdlegal.com)>  
**Cc:** Mariah Garcia <[mariah@loevy.com](mailto:mariah@loevy.com)>; Julie Goodwin <[julie@loevy.com](mailto:julie@loevy.com)>  
**Subject:** RE: Charles P. Golbert v. Aurora Chicago Lakeshore Hospital, et al., Case No. 1:19-CV-08257 (N.D.Illinois.)

Matt:

Thank you for your response. Given the length of time the subpoena has been outstanding, please let me know Sabra's final position with respect to the subpoena on or before June 18, 2021. Thank you.

--Scott

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